

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LARRY LAYMON,)
)
Plaintiff)
)
v.) Case No. 05-193E
)
THE CANADA LIFE ASSURANCE CO.)
)
Defendant)

MOTION TO WITHDRAW FROM REPRESENTATION

____NOW COMES, Jeff A. Connelly, Esquire, and requests this Honorable Court to allow him to withdraw as attorney of record for Plaintiff, Larry Laymon and states as follows:

A. Introduction

1. Plaintiff is Larry Laymon; Defendant is The Canada Life Assuance Co.
2. Plaintiff is suing Defendant in connection with an alleged bad faith action which commenced in the Erie County Court of Common Pleas under the suit filed at the above referenced number.

B. Argument

3. That there is good cause for this Honorable Court to grant this motion to withdraw because the professional relationship between Mr. Laymon and Attorney Connelly has ceased to work and as the parties are not in agreement as to how to pursue this matter.
4. The Petitioner has provided consent to Attorney Connelly to withdraw.
5. Attorney Connelly has advised Mr. Laymon to seek alternate counsel so that this case may proceed.
6. That minimal delay and no harm will come to Mr. Laymon's case should Attorney Connelly be permitted to withdraw from this case.

7. That Mr. Laymon has already removed his file from Attorney Connelly's office / possession.

C. Conclusion

Attorney Connelly and Plaintiff have undergone a breakdown in their working relationship and disagree upon the merits of the case itself and that for Attorney Connelly to continue on the case would be detrimental to the case that Mr. Laymon has brought before the court and would not be in the best interest of Mr. Laymon. For these reasons, Attorney Connelly requests this Honorable Court enter an order permitting his withdrawal from this case.

Respectfully submitted,

CONNELLY LAW OFFICE

/s/ Jeff Connelly
Jeff A. Connelly, Esquire
PA ID # 26145
824 Hilborn Avenue, Suite 1
Erie, PA 16505
814.464.9500

CERTIFICATE OF SERVICE

I, certify this 5th day of August, 2005, a true and correct copy of the Motion to Withdraw was served upon the Plaintiff and all counsel of record in this matter via U. S. Mail.

Larry Laymon
3063 West 11th Street, Apt. 25
Erie, PA 16505-3972

John P. Davis, III
Jones Gregg Creehan & Gerace
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